

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,
v.
Jorge FLORES-Romero
Defendant.

} Magistrate Case No.: '08 MJ 8279
} COMPLAINT FOR VIOLATION OF
} 21 U.S.C. § 952 and 960
} Importation of a Controlled Substance
(Felony)

The undersigned complainant being duly sworn states:

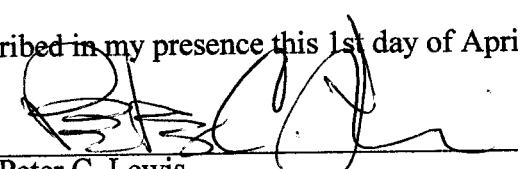
That on or about March 28, 2008, within the Southern District of California, defendant Jorge FLORES-Romero did knowingly and intentionally import approximately 59.36 kilograms (130.59 pounds) of marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached probable cause statement incorporated herein by reference.


Special Agent

U.S. Immigration and Customs Enforcement

Sworn to before me and subscribed in my presence this 1st day of April 2008.


Peter C. Lewis
United States Magistrate-Judge

PROBABLE CAUSE STATEMENT

I, Special Agent Russell H. Vensk Jr., declare under penalty of perjury, the following is true and correct:

On March 28, 2008, at approximately 1310 hours, Jorge FLORES-Romero entered the United States from Mexico at the Calexico, Ca., West Port of Entry. FLORES was the driver, registered owner and sole occupant of a 1993 Ford F-150 XLT pick-up truck.

During an inspection of the vehicle, Customs & Border Protection Officers discovered twenty-four packages concealed within the four tires of the vehicle. One of the packages was probed and a green leafy substance was extracted, which was field-tested and gave a positive indication for the presence of marijuana. The total weight of the packages was 59.36 kilograms (130.59 pounds).

FLORES was arrested for a violation of Title 21, United States Code, Sections 952 & 960, Importation of Controlled Substances.

Executed on 03/29/08 (date) at 0232 (hours).



Russell H. Vensk Jr.
Special Agent
Immigration & Customs Enforcement

On the basis of the facts presented in the probable cause statement consisting of 1 page(s), I find probable cause to believe that the defendant(s) named in the probable cause statement committed the offense on 03/28/08 in violation of Title 21, United States Code, Section(s) 952 & 960.



Anthony J. Battaglia
United States Magistrate Judge

3/29/08 9:35AM
Date/Time